

From: [ANDERSON Jim M](#)
To: [Eric Blischke/R10/USEPA/US@EPA](#); [Chip Humphrey/R10/USEPA/US@EPA](#)
CC: [LACEY David](#); [MCCLINCY Matt](#)
Subject: RE: Revised RPAC Letter
Date: 12/01/2008 10:41 AM

Eric,
OK, we'll give you a call at 1:00 Tues 12/2.

Jim

-----Original Message-----

From: Blischke.Eric@epamail.epa.gov [mailto:Blischke.Eric@epamail.epa.gov]
Sent: Monday, December 01, 2008 10:37 AM
To: ANDERSON Jim M; Humphrey.Chip@epamail.epa.gov
Cc: LACEY David; MCCLINCY Matt
Subject: RE: Revised RPAC Letter

Jim, it might be good for us to discuss briefly. I am available tomorrow afternoon at 1 or 1:30. I need to be done by 2:30. To quickly respond to your three main comments below:

- 1) I believe we have delinked the SCE from the data gaps analysis. We stuck in the 1st quarter statement to be supportive of DEQ.
- 2) I think it is best to keep our data gaps general. I do not think we need the meeting as you suggest. I would rather wait until we get a response from RPAC. We can discuss this further.
- 3) I think we have some flexibility here but I think that this is a 3-way (or 4-way) conversation between EPA, DEQ, RPAC and maybe the LWG. We have suggested this in the letter.

Eric

"ANDERSON Jim M"
<ANDERSON.Jim@deq.state.or.us>

12/01/2008 09:56 AM

To
Eric Blischke/R10/USEPA/US@EPA,
"MCCLINCY Matt"
<MCCLINCY.Matt@deq.state.or.us>,
"LACEY David"
<LACEY.David@deq.state.or.us>

cc

Subject

RE: Revised RPAC Letter

Eric,

I understand my e-mail below caused some concern & frustration in your shop. My goal is to support EPA in making sound project decisions, not to create obstacles. I met with Dave L & Matt this morning, & we thought about giving you a call to work thru the issues, but we didn't want to blindside you. So, if you'd like..., Dave, Matt & I are free Tues afternoon 12/2 if you want to call us to discuss & try to resolve your concerns.

Jim

From: ANDERSON Jim M
Sent: Monday, November 24, 2008 5:18 PM
To: 'Blischke.Eric@epamail.epa.gov'; MCCLINCY Matt; LACEY David
Cc: Humphrey.Chip@epamail.epa.gov; Koch.Kristine@epamail.epa.gov
Subject: RE: Revised RPAC Letter

Eric,

Thanks again for giving us the opportunity to review EPA's draft letter. We appreciate you considering our 11/4 comments on the 1st draft of EPA's letter, & think you resolved a number of our comments. Dave L, Matt & I all reviewed the letter & overall it looks, but we still have some concerns. Before I list those concerns, I'll just say that this is an important letter that should go out without too much more delay.

- 1) Upland RI & SCE needed to support GW pathway assessment (2nd full paragraph, page 3)- In EPA's original draft letter, you stated that an upland RI & SCE are needed in order for EPA to determine if there are any in-water PH RI/FS data gaps associated with GW discharge from Rhone Poulenc. We objected to this statement in our 11/4 e-mail. In your

recent revised letter you state that a complete upland RI & SCE are needed to evaluate GW discharges (as opposed to data gaps determination). We agree with that revised statement. However, in the last full paragraph of page 3 of the revised draft letter, EPA requests that SLLI submit the upland RI & SCE during the 1st quarter of 2009. This sounds like EPA is again saying the upland RI & SCE are needed for the identification of in-water data gaps. Again, we disagree.

2) Scope of work (1st full paragraph, page 3)- We're still unclear as to what EPA specifically sees as TZW data gaps & a SOW to fill those data gaps. We suggest that EPA/partners convene a mtg to discuss the existing data, develop a site-specific hydro/exposure CSM, identify specific data gaps, & then develop specific sampling objectives & a SOW. After this is done, then EPA should direct the LWG (or SLLI as an agent for the LWG) to develop a GW Pathway FSP.

3) Agency providing oversight (last page)- We understand some of the advantages of SLLI doing the in-water work as an agent of the LWG under DEQ's oversight include: SLLI's previous work & familiarity with the site/releases; EPA does not have a contractual agreement with SLLI; & the contemplated in-water work will support upland source control efforts. However, there are also disadvantages to this construct..., for example, DEQ does not have the authority EPA has to waive necessary permits/steps needed for sampling (e.g., Corps permit, DSL agreement/permit, etc). Typos-

-1st bullet, page 1- DGZ, not "DGS".

-1st full paragraph, page 3- Drop the "," at the end of the last sentence.

Jim Anderson,"

Manager, DEQ Portland Harbor Section

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-----Original Message-----

From: Blischke.Eric@epamail.epa.gov [mailto:Blischke.Eric@epamail.epa.gov]
Sent: Friday, November 21, 2008 10:10 AM
To: MCCLINCY Matt; LACEY David; ANDERSON Jim M
Cc: Humphrey.Chip@epamail.epa.gov; Koch.Kristine@epamail.epa.gov
Subject: Revised RPAC Letter

Attached is the revised RPAC letter. It goes to SLLI. It references the discussions we had with SLLI in 2007. Upon reflection, I believe we should use the GASCO model for this work. It seems to match the agreement we had in 2007 and the fact that the evaluation was sent to DEQ.

Please let me know your thoughts.

Thanks, Eric

(See attached file: RPACLetter112108.doc)